

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

-v.-

JOSHUA MAST, *et al.*,

Defendants,

CIVIL NO: 3:22-cv-00049-NKM-JCH

**DEFENDANT RICHARD MAST’S MOTION TO SEAL EXHIBITS 1-5 TO THE MOTION  
TO VACATE AND MEMORANDUM OF LAW IN SUPPORT OF MOTION TO SEAL**

Defendant Richard Mast hereby moves for an order to seal Exhibits 1 through 5 to his motion to vacate (Dkt. No. 442) pursuant to Local Civil Rule 9 and this Court’s Protective Order (ECF No. 26).

In support of this motion to seal, Defendant Richard Mast states as follows: This Court has issued a Protective Order (ECF No. 26) allowing Plaintiffs to proceed under pseudonyms and requiring the parties to use pseudonyms. The five exhibits arguably are subject to sealing per the P.O. Accordingly, Defendant Mast requests that the Court order the sealing of the five exhibits Dkt. Nos. 442-1-5.

A proposed Order is attached as Exhibit A to this Motion.

Dated: July 8, 2024

Respectfully submitted,

/s/David Yerushalmi

David Yerushalmi, Esq.\*

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that a copy of the foregoing has been served by ordinary U.S. mail upon all parties for whom counsel has not yet entered an appearance electronically: none.

/s/David Yerushalmi  
David Yerushalmi, Esq.